

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

TEAL PEAK CAPITAL, LLC;

Plaintiff,

v.

ALAN BRAM GOLDMAN;

Defendants.

Civil No. 3:20-cv-1747

Breach Of Contract; Specific
Performance Of Contract;
Reimbursement Of Funds, Costs
And Expenses

Motion for Continuance of Pretrial Conference

To the Honorable Court:

Comes Now, Teal Peak Capital, LLC ("TPC"), and through the undersigned attorney, respectfully states and prays:

1. During the Conference held on May 6, 2022, this Court set August 31, 2022, as the deadline for discovery; September 16, 2022, for filing the Pretrial Conference Report; and September 23, 2022, for the Pretrial Conference. Unfortunately, for the reasons explained below, the undersign needs a short modification to this schedule.

2. In compliance with the set scheduled, the parties worked to complete the discovery, and in indeed they did. They were, however, forced to finish a little over a week past the August 31st deadline. It so happens that, two days before the date the parties separated for the deposition of defendant Mr. Goldman (August 19), he contracted the virus that causes COVID-19, and the deposition had to be postponed. The parties accommodated Mr. Goldman's deposition for August 30 and the one for Mr.

Grzan the following day. But, as luck would have it, on August 30, the undersigned tested positive for COVID-19 and was forced to cancel both Mr. Goldman's and Mr. Grzan's deposition. The depositions were finally taken on September 6 and 8, respectively.

3. Problems also occurred in Luna Commercial II, LLC v. BMF, Inc., 19-cv-01698 (DRD), a case where we represent the defendant. That case, which was put on fast track by Judge Domínguez, had four depositions scheduled for the week of August 29 through September 2, and a non-jury trial set for September 20-21. But again, because of our illness and the hospitalization of one of the witnesses (dengue), the parties had to seek authorization to modify the preset schedule. This resulted in having to cram the four depositions this week; prepare the pretrial report and submit it by this Friday; appear for the Pretrial Conference on Tuesday; and see trial on September 27 and 28.

4. These unexpected developments and change of agendas have prevented the undersigned from meeting with his client and the attorney for the defendant, to then prepare the Pretrial Report and submit it by this Friday, September 16. Thus, the undersign respectfully requests a continuance of the Pretrial Conference so that this important process may be completed.

5. This request is presented with the express consent of attorney for the defendant, Mr. Arias, and it is in no way sought to delay the proceedings. The Plaintiff wants to have its day in court as soon as possible. But circumstances beyond the control of the parties have made it impossible for the undersigned to be ready for the

September 23 Pretrial Conference. Fortunately, the extension needed does not exceed two weeks. Our proposal is to move the Pretrial Conference for the 5th (afternoon), 6th or 7th of October and the filing of the Report by Friday, September 30, 2022.

Wherefore, TPC asks that this Court continue the Pretrial Conference for the 5th (afternoon), 6th or 7th of September and set the filing of the Report for September 30, 2022.

Respectfully Submitted.

In San Juan, Puerto Rico, this 15th day of September 2022.

I hereby certify that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the Court's CM/ECF system, which will send notice of its filing electronically to the attorneys of record.

**Sánchez-Betances, Sifre &
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s/Adrián Sánchez-Pagán

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